

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEA TRADE MARITIME CORPORATION and
GEORGE PETERS,

Plaintiffs,

v.

STELIOS COUTSODONTIS, FRANCES A
ELENI COUTSODONTIS, GENERAL
MARITIME ENTERPRISES CORPORATION,
ATTIKA INTERNATIONAL NAVIGATION SA,
IASON SHIPPING LTD., PINTO SHIPPING
LTD. and KARTERIA SHIPPING LTD.,

Defendants.

Civil Action No.: 09 CIV 00488 (BSJ)

**PLAINTIFFS' NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Peter A. Halprin (and accompanying exhibits), and Plaintiffs' Local Civil Rule 56.1(a) Statement, all dated February 16, 2011, Plaintiffs Sea Trade Marine Corporation and George Peters ("Plaintiffs") hereby move this Court (Judge Barbara S. Jones), pursuant to Federal Rule of Civil Procedure 56, for an Order granting Plaintiffs' Motion for Summary Judgment: (a) declaring that Defendant Coutsodontis does not have a shareholder interest in Sea Trade, or alternatively, (b) ordering that Defendant Coutsodontis has breached his fiduciary duties to Sea Trade and therefore must, in addition to other relief, forfeit any shareholder interest that he may have in Sea Trade.

PLEASE TAKE FURTHER NOTICE that pursuant to Federal Rule of Civil Procedure 56, answering papers, if any, are to be served within twenty-one (21) days after service of the moving papers.

Dated: February 16, 2011

New York, New York

By: /s/ Peter A. Halprin

Peter A. Halprin, Esq.

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